

SACK & SACK

ATTORNEYS-AT-LAW
70 EAST 50TH STREET, 10TH FLOOR
NEW YORK, NEW YORK 10022
PHONE: (212) 702-9000 • FAX: (212) 702-9702

Eric Stern

e-mail: Estern@SackandSack.com

September 24, 2018

BY ECF:

Honorable John F. Keenan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1930
New York, New York 10007

Re: Freeman & Co., LLC et al v. Seto et al
Case Number 1:18-cv-03180-JFK

Dear Judge Keenan:

We represent the Plaintiffs in the above-referenced matter. We write this letter in accordance with Rule I.A of your Honor's Individual Motion Practice and Rules, and pursuant to your Honor's July 23, 2018 Order, to request that this Court reopen this matter.

Defendant Seto originally agreed and informed Plaintiffs that he would pay "x" dollars in consideration for settling this matter, which represented approximately 25% of the legal fees incurred by Plaintiffs. Last week, after months of negotiating this settlement and agreeing to "x" amount in principle, Defendant Seto disingenuously informed Plaintiffs that he can now only afford to pay 50% of "x" dollars.

We therefore request that the Court reopen this matter.

We thank the Court in advance for its consideration. We look forward to hearing from the Court in due course.

Respectfully submitted,

Eric R. Stern, Esq.

cc: Victor Bushell, Esq.
Kenneth Rubinstein, Esq.